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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**
Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**SUPPLEMENTAL DECLARATION OF
CATHY YANNI IN SUPPORT OF THE
APPLICATION OF THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
PURSUANT TO 11 U.S.C. § 1103 AND
FED. R. BANKR. P. 2014 AND 5002 TO
RETAIN AND EMPLOY CATHY
YANNI AS CLAIMS ADMINISTRATOR
NUNC PRO TUNC TO JANUARY 13,
2020 THROUGH THE EFFECTIVE
DATE OF THE RESOLUTION TRUST
AGREEMENT (Relates to Dkt. Nos. 5723
and 5724)**

Date: March 10, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102
Objection Deadline: March 3, 2020

1 Pursuant to section 1746 of title 28 of the United States Code, I, Cathy Yanni, hereby
2 declare under penalty of perjury that the following is true to the best of my knowledge, information,
3 and belief:

4 1. I am an attorney at law licensed to practice law in the state of California. Since
5 1998 I have been a neutral with JAMS, which specializes in the resolution of claims and legal
6 disputes by providing efficient, cost-effective and impartial ways of overcoming barriers at any
7 stage of conflict. I have extensive experience resolving mass tort claims, and have acted as a
8 special master, mediator and administrator in multiple cases involving tens of thousands of claims,
9 including claims for personal injury, property damage and business loss.

10 2. I am presently serving as the court appointed Administrator of the Wildfire
11 Assistance Program (the “**Administrator**”) established in the bankruptcy cases (the “**Cases**”) of
12 PG&E Corporation and Pacific Gas and Electric Company (collectively the “**Debtors**”). I am duly
13 authorized to make this supplemental declaration (the “**Declaration**”). Unless otherwise stated in
14 this Declaration, I have knowledge of the facts set forth herein and, if called as a witness, I would
15 testify thereto.

16 3. I submit this Declaration as a supplement to my declaration (the “**Original**
17 **Declaration**”) dated February 11, 2020 (Dkt. No. 5724), and in further support of the *Application*
18 *of the Official Committee of Tort Claimants (the “TCC”) Pursuant to 11 U.S.C. § 1103 and Fed.*
19 *R. Bankr. P. 2014 and 5002 to Retain and Employ Cathy Yanni as Claims Administrator Nunc Pro*
20 *Tunc to January 13, 2020 Through the Effective Date of the Resolution Trust Agreement* (the
21 “**Application**”) (Dkt. No. 5723).

22 4. I was appointed Administrator on June 5, 2019. Since my appointment, I have taken
23 several steps to ensure that the funds set aside for the Wildfire Assistance Program have been and
24 continue to be distributed in a fair and equitable manner.

25 5. As a result of my work as Administrator, I have gained significant knowledge
26 regarding the claims of a large portion of the tort claimants. Thousands of the claimants whose
27 claims I administered and continue to administer under the Wildfire Assistance Program will also
28

1 be beneficiaries of the Fire Victim Trust (the “**Trust**”). As a result, I will be able to administer
2 the claims filed against the Trust quickly and effectively.

3 6. I anticipate being able to complete the administration of the Wildfire Assistance
4 Program by April 15, 2020.

5 7. I have been retained by the TCC to act as the proposed independent claims
6 administrator for the Trust. To date, my services as proposed claims administrator have been
7 limited to facilitating the development of a claims resolution process. I have spent approximately
8 180 hours and incurred approximately \$225,000 in fees developing these procedures. My work
9 has been separate and distinct from the services provided by the proposed trustee, the Honorable
10 John K. Trotter (Ret.), with whom I have worked in the past, and Baker & Hostetler LLP, counsel
11 to the TCC. Brown Rudnick LLP has been assisting me in my capacity of proposed independent
12 claims administrator and has provided advice related to the Trust and the claims resolution
13 procedures (“**CRP**”). Additionally, the proposed Trust and proposed CRP expressly set forth the
14 scope of the duties of the claims administrator and trustee, and provide limitations on the role of
15 the claims administrator. As a result, my services have not, and will not, overlap with those of the
16 trustee or Baker & Hostetler LLP. Moreover, it is anticipated that many of the tasks assigned to
17 the claims administrator will mirror those I perform as Administrator.

18 8. While I have conferred with the TCC, Debtors, and counsel for individual fire
19 claimants in connection with the establishment of the Wildfire Assistance Program, I have always
20 exercised my independent judgment as Administrator. If I am retained as claims administrator for
21 the Trust, I will continue to exercise my independent judgment and independently evaluate issues
22 of concern regarding the Trust’s claims resolution process.

23 9. Based on the foregoing and upon my statements in the Original Declaration, I
24 believe that I am disinterested as defined in section 101(14) of the Bankruptcy Code, do not hold
25 or represent an interest materially adverse to the Debtors or their estates, and do not have any
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1 conflicts which would prevent me from serving as proposed claims administrator for the Trust pre-
2 confirmation, or as claims administrator post-confirmation.

3 Dated: February 28, 2020

4
5 By: 

Cathy Yanni